Supreme Court, U.S.
FILED

No. 091148 JAN 4 - 2010

OFFICE OF THE CLERK

In The

Supreme Court of the United States

Jerry DILLON (Father), Individually

Petitioner

v.

State of Indiana, et al.

Respondent

On Petition for Writ of Certiorari
To The Lake Superior Court
Lake County, Indiana

Petition for Writ of Certiorari

Jerry Dillon, Pro Se
P.O. Box 1355
Calumet City, IL. 60409
708-205-2883

QUESTION PRESENTED:

Whether the Fourteenth Amendment, "Due Process and Equal Protection Clauses" to the United States Constitution are violated by the proceeding and decision of Indiana's Lake Superior Court, Juvenile Division to deny full faith and credit of payments and other court orders (Article Four, Section 1) to father of four children in a proceeding that deviated from established child support guidelines?

Parties

Petitioner is Jerry W. Dillon. Respondents are the State of Indiana, Lake County Superior Court, Magistrate John Sedia, State Prosecutor Bernard A. Carter, Laurie Leber, Burton A. Padove and Associates, Florence Thicklin-Mason.

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OPINIONS AND ORDERS BELOW

The Indiana Supreme Court's Order denied review (due to legal counsel's procedural errors) and relief was sought from the U.S. District Court, Northern District of Illinois. The U. S. District Court, Northern District of Illinois was barred from the exercise of jurisdiction citing the Rocker-Feldman doctrine. U.S. Court of Appeals denied review on Dec. 22, 2009 citing lack of jurisdiction (time for filing expired while awaiting decision of Writ of Certiorari with United States Supreme Court).

Jurisdiction

The U.S. District Courts, Northern District of Illinois issued its opinion on September 1, 2009 citing lack of subject-matter jurisdiction. United States Court of Appeal, Seventh Cir. dismissed for lack of jurisdiction on 12/22/09. Thus, this Court has jurisdiction over this timely petition for writ of certiorari based on 28 U.S. C. § § 1253,1254.

Statutes and Constitutional Provisions

The Article Four , Section 1 of the U.S. Constitution provides:

> "Full Faith and Credit shall be given in each State to the public Acts, Records and judicial Proceeding of every other State. "

The Fourteenth Amendment to the United States Constitution provides in relevant part:

> " No person or State, respectively, shall deprive any person of life, liberty or property, without due process of law...."

> " No State shall... deny any person within its jurisdiction the equal protection of the law."

Case Setting

On July 11, 2005 in Lake County Indiana, the Plaintiff, Jerry W. Dillon, pro se, a father of four presented to the Lake Superior Court, Juvenile Division in the action of Dillon vs. Leber, that he earns approximately $48,000.00/year(Federal tax returns, and pay stubs) and his net income is $3100.00 /month which had been confirmed by two other orders of support from the Circuit Court of Cook County, IL for Dillon's other children.

On August 18, 2005 a decision, from the Lake Superior Court, Juvenile Division, was rendered by the Honorable Magistrate John Sedia. A decision that appeared to be based on misinterpreted evidence from a questionably acquired outdated residential loan application of the year 2000 (a residential loan application that had been replaced by two more recent loan applications). Second, this residential loan application did not dispute Plaintiff's $ 48,000.00 per year income and court transcript bears

witness. Third, the means by which the loan application was acquired by Leber appears to be a violation of Dillon's Fourth Amendment Right which constituted a unconstitutional search of Dillon's cataloged records without a warrant, court authorization, or approval .

Even, an outdated residential loan application of Dillon is still protected by a Right to Privacy and Leber's acquisition of that loan application constituted an unconstitutional search unsupported by a warrant or probable cause. Dillon manifested a subjective and an objective reasonable expectation of privacy that Leber unlawfully violated, and that evidence obtained from the search of his cataloged records must be suppressed pursuant to the Fourth Amendment and in particular, the holding in United States v. $277,000 U.S. Currency, 941 F. 2d 898(9th Cir. 1991).

A hearing on the Motion to Correct Errors was held on September 4, 2007, at Lake Superior Court,

Juvenile Division presided by the Honorable Magistrate John Sedia. The Juvenile Court's decision was that when a pro se Litigant represents himself in his court, he does so "At His Own Peril" and the Motion to Correct Errors was denied. Is Equity and Fairness outweighed on the Scales of Justice by a deliberate decision to punish a lay citizen for defending himself and his property? All the elements were presented to the Juvenile Court at the hearing of August 18, 2005 and September 4, 2007 to render an impartial decision, other Court Orders, Federal Tax Returns, and pay stubs. After a pro se party has timely filed financial records beneficial to his cause with the Court's Clerk, and provided same to opposing counsel; does counsel have an ethical/professional duty to disclose the record's existence to the Court at hearing resulting in a $50,000.00 arrearage?

A timely appeal was filed with the Indiana Court of Appeals. Procedural violation and error by hired counsel Luke Townsend (Supreme Court # 19794) resulted in a dismissal, March 12, 2008. Hired

and paid, Counsel Townsend, failed to filed an appearance and filed Dillon's petition to the Indiana Appellate Court as pro se, after time for filing had expired. A request to the Indiana's Court of Appeals for the rehearing of the matters of Dillon v Leber was denied on April 30, 2008. The Indiana's Supreme Court denied review August 28, 2008. When the public places its faith and meager finances in the hands of a licensed attorney, where is the remedy at law for their errors or lack of ethics ?

Relief was sought in the United State District Court, Northern District of Illinois. Pursuant to the Fourteenth Amendment, Equal Protection and 42 U.S.C. § 660. The case was dismissed for lack of Subject Matter Jurisdiction on September 1, 2009 and this timely Petition for Writ of Certiorari followed. Clerk of United States Supreme Court refused to docket this case citing that the case must be appealed from the United States Court of Appeal or the highest Court of the State. A request for extension to file was denied by the United States District Court, Northern

District of IL. Immediately, an appeal was filed with the United States Court of Appeals, Seventh Circuit. Seventh Circuit denied review for Lack of Jurisdiction (appeal was untimely filed).

REASONS FOR GRANTING PETITION

Errors upon errors by hired counsel have exhausted defensible resources and left this pro se litigant with an entanglement that he alleges to be a fraud against his property and a certain distortion of the truth. Justice, Equity and Fairness is sought through review from this Honorable Court from a decision by a State Court to punish a citizen, specifically, for defending himself and his property when in fact all the necessary elements to render an impartial decision were before that Court. Opposing counsel of record and officer of the court Burton Padove should have an ethical and professional responsibility to disclose the financial record's

existence to that Court. Two (2) orders (for Dillon's other children) from other courts, Circuit Court of Cook County, IL., laid the foundation following a template set by State and Federal mandates for child support determination and subsequent support (42 U.S.C. § 651-669). The Indiana Juvenile Court chose to ignore those mandates and the templates followed by the Illinois Court orders and Federal guidelines and said on the record that **"Illinois Orders are not applicable in Indiana"**. Indiana's Juvenile Court did error in disregarding the Constitutional Rights of citizen Dillon because, construed liberally, he was a pro se litigant. The Magistrate's Judge willful, deliberate position to disregard the law is not likely an isolated incident. It is apparent, this Court should correct and clarify the law for all and to ensure that all jurisdictions, State or Federal, are properly protecting rights ensured pursuant to the Article Four, Fourth, Fifth and Fourteenth Amendments to the United States Constitution.

Reason to Review the Lake Superior Court, Juvenile Division Decision for Litigant Dillon's Child Support Determination and Contempt Citation

Article Four to the United States Constitution requires States to give " Full Faith and Credit " to the public Acts, Records and Court proceeding of other States. 28 U.S.C. § 1738B; Franchise Tax Board v. Hyatt, 2, 538.S.488,494(2003); Allstate and Hague 449 U.S. 302(1981).

> At the core of Article Four, as in context to child support both retroactive support or future support, is the fundamental concept, which order is primary, secondary and tertiary... and the delineation of support percentages follow.

42U.S.C.§ 651 through 669; 28 U.S.C. § 1738(B); 750 ILCS§ 5/505; IC 31-16-6-2;

The U.S. Code as printed to the public, 28 U.S.C. § 1738B does not appear to fully address all the contemporary options present in today's market place

regarding the responsibility of the estranged obligor. As in this Case, 3 courts have issued child support orders for the same obligor but his different children. It is well settled in Illinois state policy that 20% (750 ILCS§ 5/505) of the disposable income of the obligor is given to the first issued order for child support and each subsequent order is given in increments of the disposable income of the obligor with a maximum of 50 percent of obligor's disposable income. The Indiana Juvenile Court's decision that is in question (August 18, 2005 and Correction of Errors denied September 4, 2007) has issued an order that could potentially garnish 80 % (Eighty Percent) of Dillon's pay, if enforced. Further, Dillon is now deprived of any remedies at law.

The Court shall determine the minimum amount of support by using the following guideline:

# of Children	% of Supporting Party's Net Income
1	20%
2	25%
3	32%
4	40%
5	45%
6 or more	50%

750 ILCS § 5/505, IC § 31-16-6-2, Title IV-D of the Federal Social Security Act (42U.S.C. § 651 through 669).

Another fact that obscures the clarity of the law (State or Federal) is that Mr. Dillon is a resident of the State of Illinois. A question certain to arise is whether the State of Illinois can constitutionally enforce an order issued by the State of Indiana that is contrary to its State Constitution and Laws. Further, Equal Protection Under the Law is in question, as Mr. Dillon, an Illinois resident, sought to ask the

Indiana Juvenile Court for assistance in establishing visitation and support to keep a watchful eye on his child amongst allegation of abuse and neglect by the child's mother and to establish specific child support that followed the guidelines of State (Illinois and Indiana) and Federal Law. Was an impartial decision rendered in the face of the evidence? Dillon does not believe that two other tribunals erred and somehow Magistrate Sedia, **disregarding all written law**, has it correct. The Circuit Court of Cook County, IL., on two occasions, properly concluded the initial and then the subsequent support determination for Dillon's first two children prior to the determination of support by the Indiana Juvenile Court. The State of Indiana needs to clarify its unilateral interpretation of State and Federal law for child support before this court so that other citizens are protected as well.

Justice Harlan Stone wrote:

> [P]rejudice against discrete and insular

> Minorities may be a special condition, which tends seriously to curtail the operation of those political processes ordinarily to be relied upon to protect minorities, which may call for a correspondingly more searching judicial inquiry. 304 U.S.144,152n.4(1938).

Dillon alleges that he was **prejudiced** by the proceeding of the Indiana's Juvenile Court and Magistrate Sedia by means he had no control and was not equally protected. The factual scenario mirrors *Strauder v. West Virginia (1880)* which the Supreme Court asserted that the purpose of the Equal Protection Clause was;

> To assure that the colored race, the enjoyment for all the civil rights that under the law are enjoyed by white persons, and to give to the race the protection of the general government, in that enjoyment, whenever it should be denied by the States.

Just as this Court warned in *Silverman v. United States*: What the court said long ago bears repeating now:

> " It may be that it is the obnoxious things in its mildest and least repulsive form: but illegitimate and unconstitutional practices get their first footing in that way namely, by silent approaches and slight deviations from legal modes of procedure."

365 U.S. 505, 512,81 S.Ct.679,683(1961); (quoting Boyd v. United States, 116 U.S. 616, 635, 6 S. Ct. 524, 535(1886).

This Court should not allow this deviation from the proper mode of procedure to stand. Article Four Section 1 and Federal Social Security Act (42U.S.C. 651 through 669), specifically, binds the Indiana Juvenile Court to a particular mode of procedure applicable to all citizens. (Numerous legal advisors concur)

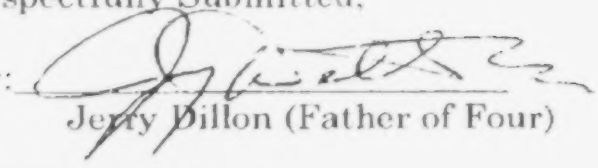
Conclusion

The Indiana Juvenile Court's allegedly flawed opinion should not stand as it grossly conflicts with established State and Federal statutes. The Indiana Juvenile Court's opinion hangs by a thread of evidence acquired by unconstitutional means. The searching of Dillon's cataloged records by Leber lacks probable cause and is arguably, grossly and deliberately misinterpreted. Further, the Indiana 's lower court opinion seeks to garnish **eighty percent** (80 %) of Dillon's (Father of four children) pay.

Countless fathers, trying to do the right thing by their children, need this Court's protection against rogue practices, predators and the unethical. The Petitioner asks this Court to grant review and reverse based on the State of Indiana's violation of Dillon's constitutionally protected rights, Federal and State guidelines, and because Dillon is deprived of all other remedies at Law. Based on the foregoing, petitioner requests of this Court to grant this petition for

writ of certiorari.

Respectfully Submitted,

By: 

Jerry Dillon (Father of Four)

Jerry Dillon, Pro Se
Petitioner
P.O. Box 1355
Calumet City, IL. 60409
708-862-1800

Appendix

APPENDIX A

In the United States Court of Appeals
Seventh Circuit

Jerry W. Dillon	)	
Plaintiff-Appellant	)	09-3844
	)	
	)	OPINION
V.	)	
	)	(Filed Dec. 22, 2009)
State of Indiana, et. al	)	
Respondent	)	

Appeal from the U.S. District Court, Northern Dist. of IL

Cause # 08C5299

Terence Evans, Cir. Judge,
Diane S. Sykes, Cir. Judge
John Daniel Tinder, Cir. Judge

The following is before this court:

1. **Appellant's motion to certify interlocutory Appeal**, filed on December 9, 2009 by pro se appellant.

2. Appellant's motion to amend motion to

certify interlocutory Appeal, filed on December 14, 2009 by pro se appellant.

3. Motion for leave to file Appeal with United States Supreme Court. filed December 9, 2009 by pro se appellant.

4. Amended Motion For Leave to file Appeal With United States Supreme Court, filed on December 16, 2009 by pro se appellant.

IT IS ORDERED that this appeal is Dismissed for lack of jurisdiction because the notice of appeal was untimely filed.

IT IS FURTHER ORDERED that #1,#2,#3,#4 are Denied.

Jerry Dillon, Pro Se
Petitioner

David A. Arthur, Burton Padove
Attorney For Respondent

APPENDIX B
IN THE
U.S. DISTRICT COURT,
NORTHERN DISTRICT OF ILLINOIS

JERRY DILLON	)	
Petitioner	)	08C5299
	)	
	)	OPINION
v.	)	
	)	(Filed Sept. 1, 2009)
State of Indiana, et al.	)	
Respondent	)	

Appeal from the Indiana Supreme Court in Indianapolis, IN.
Cause # 45A03-0712-JV-00572
Lower Court # 45D060106JP429

The Honorable Joan H. Lefkow Judge

Dismissed- Lack of Subject Matter Jurisdiction

Jerry Dillon, Pro Se
Petitioner
David A. Arthur, Burton Padove
Attorney for Respondents

APPENDIX B -Continue

Docket Entry Text

Defendants' motions to dismiss[#31,#32,and #39] are granted. The case is dismissed for lack of subject matter jurisdiction. All other motions--including defendants Padove and Leber's Joint motion for summary judgment[#40], "Plaintiff's combined motion opposing defendants motion to Dismiss Amended Complaint"[#42], " Plaintiff's combined Motion for leave to file complaint in United States Appellate Court "[#43], and "Plaintiff's Motion Opposing Defendant's Motion for Summary Judgment"[#44]-- are terminated as moot. The case is terminated.

See detail of text to follow;

APPENDIX B -Contin.

U.S. District Court text details;

Statement

This case was brought by plaintiff Jerry W. Dillon against defendants State of Indiana, Lake County Superior Court, Magistrate John Sedia, State Prosecutor Bernard A. Carter, Burton A. Padove & Associates, Laurie Leber and Florence Mason. In this action, plaintiff seeks to have a number of child support orders- all of which appear to have been issued pursuant to child support proceeding in Indiana State court (Judges error)--declared null and void, enjoined, or otherwise set aside. Plaintiff also seeks compensatory damages in the amount of $181,413.00, as well as unspecified punitive damages. As best the court can discern, plaintiff's central grievance appears to be that, in aggregate, his child support obligations under those ordered result in the garnishment of 80% of his wages. According to the amended complaint,

defendant (judges error, i.e. plaintiff) brings action under 42 U.S.C. 1983,and 1985 for the violations of his due process and equal protection and other (unspecified) constitutional rights under the First, Fourth, Fifth, Eighth, and Fourteenth Amendments, as well as for violation of "15 U.S.C. 1671, 303(c), " Am. Compl. __22, which the court understands to be a reference to 15 U.S.C. § 1673. Plaintiff asserts that the court has subject matter jurisdiction over this matter based on diversity jurisdiction and Under 28 U.S.C. § 1333, federal question jurisdiction and under 28 U.S. C. § 1332, and also 28 U.S.C. § 1343.

Before this court are defendant's motions to dismiss in which they assert various grounds for dismissal including the following , among others: the court lacks jurisdiction under the Rooker-Feldman doctrine; the Eleventh Amendment bars plaintiff's claims against the State of Indiana and Lake County

Superior Court; the domestic relations exception to federal jurisdiction deprives the court of jurisdiction; and Magistrate Sedia is immune from suit under the doctrine of absolute judicial immunity. Because the first of these grounds is dispositive as to the entire action, the court will focus its discussion on that issue.

The Rooker-Feldman doctrine holds that only the United States Supreme Court has jurisdiction to review a final judgment of a state court. Johnson v. Collins, 5 Fed. App' x 479, 484 (7th Cir. 2001). As the Seventh Circuit has explained, A defendant who has lost in state court and sues in federal court does not assert injury at the hands of his adversary; he asserts injury at the hands of the court, and the second suit therefore is an effort to obtain collateral review. It must be dismissed not on the basis of preclusion but for lack of jurisdiction. This is the effect of the Rooker-Feldman doctrine, which is the based on the principle that inferior federal courts cannot reexamine the decisions of state tribunals in civil litigation.

Homala v. McNamara, 59 F. 3d 647, 650(7th Cir. 1995)(citing Rooker v Feldman, 460 U.S. 413, 44 S. Ct. 149, 68 L. Ed. 362(1923); District of Columbia Court of Appeals v. Feldman, 460 U.S. 262, 103 S. Ct. 1303, 75 L. Ed. 2d 206(1983)). It is well settled that, under the Rooker-Feldman doctrine, "a plaintiff may not seek a reversal of a state court judgment simply by casting his complaint in the form of a civil rights action" in federal court. Ritter v. Ross, 992 F .2d 750, 754(7th cir 1993). The two prong test of Rooker v. Feldman asks first whether the Indiana state court 's child support proceedings were judicial proceedings, and second whether Dillon's calm in this case "are so inextricably intertwined with those state proceedings so as to make review of the claim an impermissible review of the state court proceedings." Prophet v. Prophet, 30 F. 3d 136(Table), at *1 (7th Cir. 1994) (citing Leaf v. Supreme Court of Wisconsin, 979 F.2d 589. 598 (7th cir.1992), cert. Denied, 113 S. Ct. 2417(1993)). In this case, there is no question that both prongs of the test are met. At the outset of his

complaint, Dillon characterizes his claims as follows: State of Indiana's child support proceeding violates plaintiff's due process (Fifth Amendment) and equal protection (Fourteenth Amendment) Clause [sic]...." Am. Compl. ¶ 1. Likewise , the relief plaintiff seeks, which includes having the child support order against him declared null and void or enjoined, is clearly a challenge to the Indiana state court 's judgments.

In response to the Defendants' contention that the court lacks jurisdiction under the Rooker- Feldman doctrine, plaintiffs cites Rhodes v. Penford, 694 F. 2nd 1043, 1043, 1046-47 (5th Cir. 1983), where the Fifth Circuit held that the district court was not required to abstain from exercising jurisdiction in a case where the plaintiff sought relief from a Texas state court proceeding terminating her parental rights with

respect to her daughter. Id. As the court made clear in Alcan Aluminum Corp. V. Lyntel Products, Inc. 656. F. Supp. 1138(N.D. Ill. 1987) however,

> Rhodes and Penford.... Has never been followed by any court.... Rhodes was decided two months prior to District of Columbia Court of Appeal v. Feldman... and was quickly outdated. The standard as to when a district court has subject matter jurisdiction over a claim attacking the constitutionality of a state court procedure or rule became that announced in *Feldman*. Under Feldman this court does not have jurisdiction over actions in which the constitutional claims presented are "inextricably intertwined" with a state court judgment. It is precedent, and not Rhodes, that respondents, as well as this court , were bound to follow. Id. At 1141 (citations omitted).

Plaintiff also cites Scott v. Flowers, 910 F 2d 201(5th Cir,. 1990), where the plaintiff, a justice of the peace, brought suit against the Texas Commission of Judicial Conduct and its commissioners, claiming that their public reprimand of him for making statements critical of the administration of the county judicial system violated his first amendment rights. Id. At 203-04. The Fifth Circuit found that because the plaintiff "had no vehicle other than a civil rights suit by which a challenge the Commission allegedly unconstitutional reprimand," the federal court had jurisdiction to consider his First Amendment claims. Id. At 208-09. In this case , however, Dillon challenges the judgment of the Indiana state court -- not the otherwise unreviewable act of a disciplinary commission that oversees judges-- and there is no reason to believe that a civil rights suit was the only vehicle by which Dillon could have done so.

In sum, the Rooker-Feldman doctrine clearly bars the district court's exercise of jurisdiction in this case. See Lawrence v interstate Brands, 278. App' x 681, 684 (7th Cir.. 2008) ("[Plaintiff] also contends that [defendants] and several government attorneys falsified papers filed in a child support proceeding resulting in an unfair judgment against him. But as the district court correctly observed , the Rooker-Feldman doctrine bars these claims because the injuries Lawrence alleges stem directly from state-court judgments") (citing Feldman, 460 U.S. at 486; Rooker, 263 U.S. at 416; *Beth-El All Nations Church v. City of Chicago*, 486 F. 3d 286, 292 (7th Cir. 2007)

Finally, the court notes that plaintiff's complaint appears to include claims for violation of 15 U.S.C. § 1673, a provision of the Consumer Credit Protection Act. Section 1673 sets maximum thresholds for the portion of an individual's aggregate

disposable earning which may be subject to garnishment pursuant to a child support order and mandates that "[n]o court of the United States or any State, and no State (or officer or agency thereof), may make, execute, or enforce any order or process in violation of this section " 15 U.S.C. § 1673. Even if the *Rooker-Feldman* doctrine did not bar plaintiff's action, however, plaintiff would nevertheless lack standing to bring claims for violation of § 1673, because a private cause of action does not exist under that statute. *Colvert v. Roling*, 233 Fed. App'x 587, 590 (8th Cir. 2007) (finding that a private right of action does not exist under 15 U.S.C.§ 1673); Flax v.

Delaware Div. of Family Services, No. 03-922-GMS, 2008 WL1758857, at *11 (D. Del. Apr. 16, 2008) (reviewing cases) (noting with approval that "several courts have held that the Consumer Credit Protection Act does not provide for a private cause of action under Subchapter II of the Act," which includes 15 U.S.C.§ 1673); Le Vick v Skaggs Cos., 701 F 2d 777, 780 (9th Cir. 1983) ("in providing for enforcement of Subchapter II only the Secretary of Labor, while providing for a private remedy in all other subchapters, Congress seems to have left no doubt that it did not intend to create a private right of action under Subchapter II."). Plaintiff's complaint must therefore be dismissed for lack of subject matter jurisdiction. All other pending motions are terminated as moot. This case is terminated.

"s/"_____
Honorable Joan Lefkow
Judge U.S. District Court
Northern District of Illinois

APPENDIX C

Supreme Court
STATE OF INDIANA
217 State House, Indianapolis, IN 46204
317-232-1930

KEVIN S. SMITH
CLERK OF THE COURT

Filed 04/28/08

Re: Dillon v. Leber
Cause # 45A03-0712-JV-00572
Lower Court # 45D060106JP429

ORDERED: Petition for Transfer of Jurisdiction =
DENIED this 28 day of August 2008

Randall T. Shepard, Chief Justice

Kevin Smith, Clerk

App. 16

APPENDEX D

Court of Appeals

STATE OF INDIANA

217 State House, Indianapolis, IN 46204

317-232-1930

KEVIN S. SMITH
CLERK OF THE COURT

Filed 03/12/08

Re: Dillon v. Leber
Cause # 45A03-0712-JV-00572
Lower Court # 45D060106JP429

Appellee L.L., by Counsel, has filed a Verified Motion to Dismiss Appeal. Appellant J.D., pro se, has filed a Verified Response to Appellee's Motion to Dismiss, and alternatively, Motion to Reconsider and for Time to Retain Legal Counsel and File Appellant's Brief.

Having reviewed the matter, the Court Finds and Orders as Follows:

1. Appellee's Verified Motion to Dismiss is Granted. This appeal is Dismissed

2. Appellant's Motions to Reconsider and for Time to Retain Legal Counsel and File Appellant's Brief are Denied.

Ordered this 12 day of March 2008

For The Court,

John G. Baker, Chief Judge

APPENDIX E
[SEAL]
State of Indiana, Lake County
Lake Superior Court, Juvenile Div.

Jerry Dillon	)	
	)	Cause # 45D060106JP000429
vs.	)	August 18, 2005
	)	
Laurie Leber	)	

Pending before the court was Plaintiff's motion to establish Paternity, Custody, percentage of child support. The court had an Evidentiary Hearing July 11, 2005. It is well settled that when a litigant chooses not to avail himself of the services of a licensed attorney at a trial, he does so at his own peril. The litigant who represents himself is held to the same standards as the attorney he would have (or perhaps should have) hired. This written order follows.

ORDERED:

1. Father shall pay child support as and for the support of the child in the amount of $168.80/week to the clerk of Lake Superior Court pursuant to the child

APPENDIX E.- CONTIN.
[SEAL]

support worksheet, marked as respondent's Exhibit 1, attached to and made part of this Order; plus an additional 101.20 per week on the arrearage as calculated in paragraph 2 below for the total of $270.00/week.

2. Child support shall be retroactive to June 6, 1999, with Father's gross arrearage calculated to be $54,353.60, and subtracting $9,475.00 in child support payments made by father, and adding the unpaid medical bills, leaving a net arrearage of $46, 178.60.

3. Mother is awarded the tax exemption until such time as Father satisfies the arrearage determined in Paragraph 2 above.

4. Father, as punishment for contempt of this Court's prior orders, shall pay all of Mother's attorney's fee in the amount of $7,413.34. This amount is reduced to judgment in favor of Attorney Burton A. Padove and against Jerry Dillon.

APPENDIX E.- Contin.
[SEAL]

ALL OF WHICH IS ORDERED THIS 18TH day of August, 2005.

Approved & Ordered By: %%%	Recommended By: John Sedia
Judge, Lake Superior Court Superior Juvenile Division	Referee, Lake Court, Juvenile Div.

APPENDIX D
[SEAL]
State of Illinois, Cook County
Circuit Court of Cook County

Florence Mason	)	
	)	Cause # 00D650020
v.	)	January 8, 2002
	)	
Jerry Dillon	)	

Uniform Order For Support

Ordered : $950.00/month

Modified : $729.91/month on March 09, 2009

ALL OF WHICH IS ORDERED THIS 2nd day of January, 2002.

Approved & Ordered By:

%%%_____

Associate Judge George Morrissey
Sixth Municipal District

APPENDIX E

[SEAL]

State of Illinois, Cook County
Circuit Court of Cook County

Jerry Dillon	)	
	)	Cause # 04D679149
v.	)	April 4, 2005
	)	
Frederica Douglas	)	

Uniform Order For Support

Ordered : $335.00/month

Modified by Agreement : $500.00/month on March 24, 2006.

ALL OF WHICH IS ORDERED THIS 4th day of April, 2005.

Approved & Ordered By:

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Associate Judge Thomas J. O'Hara
Sixth Municipal District